

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. APPLICATION NO. 09/828,927
ATTORNEY DOCKET NO. Q63668

REMARKS

Applicants respectfully request that the Patent Office acknowledge Applicants' claim to foreign priority, and indicate that the certified copy of the priority document, European Patent Application No. 00401006.2 dated April 11, 2000, has been made of record in the file.

Applicants thank the Patent Office for initialing the references listed on the PTO-1449 form submitted with the Information Disclosure Statement filed on April 10, 2001, thereby confirming that the listed references have been considered.

Claims 1-12 have been examined on their merits.

Applicants herein editorially amend claims 1-12 to remove reference callouts and awkward language, and to conform the claims to U.S. practice. No new matter has been added to the claims.

Applicants herein add new claims 13-16, for which support can be found in the specification and the originally filed claims. Entry and consideration of the new claims 13-16 is respectfully requested.

Claims 1-16 are all the claims pending in the application.

1. Claims 1-12 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Hino (U.S. Patent No. 6,172,976). Applicants respectfully traverse the rejection of claims 1-12, and insofar as the rejection might apply to new claims 13-16, for at least the reasons discussed below.

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Hino fails to teach or suggest at least a connection control module being adapted to communicate to a service control module of a switching node and adapted to communicate via a connection control interface to at least one other connection control module, as recited in claim 1. The Patent Office alleges that the switching controllers (222, 223, 224) of Figure 8 of Hino are equivalent to the service control module recited in claim 1. Hino discloses, *inter alia*, that a switching controller monitors the states respectively of a group of communication paths connected thereto, informs a connection controller (131) about changes of these states through an apparatus control interface (261), and receives an instruction from the connection controller through the apparatus control interface and, in response the instruction received, changes the relation of a coupling and switching among the group of communication paths. The specification of the present invention defines that a service control module is above the connection control layer by virtue of its being a client of the connection control module, which interfaces with the physical device drivers. Moreover, as defined in the instant specification, a service control module of the present invention issues service request messages that contain information with respect to which service is asked, such as connect subscriber X, connect to tone Y, connect to another half-call connection, connect a conference mixer, etc. The switching controllers of Hino, which the Patent Office alleges are equivalent to the service control modules of the present invention, perform no such functions.

Based on at least the foregoing reasons, Applicants submit that claim 1 is in condition for allowance over Hino, and further submit that claims 2-12 are allowable as well, at least by virtue

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of their dependency from claim 1. Applicants respectfully request that the Patent Office reconsider and withdraw the 35 U.S.C. § 102(e) rejection of claims 1-12.

With respect to new claim 13, Applicants submit that new claim 13 is allowable as well. Hino fails to teach or suggest at least a service interface handler that analyzes a service request message from a service control module and performs an action dependent on the result of the analysis. As discussed above, Hino fails to teach or suggest at least the service control module of the present invention, and thus, fails to teach or suggest the analyzing and responding to a service control message as recited in new claim 13. Applicants submit that new claim 13 is allowable over Hino, and further submit that new claims 14-16 are allowable as well, at least by virtue of their dependency from new claims 13.

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In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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AMENDMENTS TO THE DRAWINGS

Applicants are attaching hereto one Sheet of Replacement Drawings, wherein the labels of the boxes SIH1, SIH2, PDIH1 and PDIH2 have been centered in their respective boxes for appearance. No new matter has been added to the Replacement Drawings.

Attachment: One (1) Replacement Drawing Sheet